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May 10, 2022

VIA ECF
Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 1007

Re: *Lopez, et al. v. PEC Group Ltd., et al.*, Case No.: 1:21-cv-08806-ER

Dear Judge Ramos:

We represent the Defendants in the above-referenced action. We write jointly with Plaintiffs to request a brief 30-day extension of the current end date for discovery from June 1, 2022 to July 1, 2022.

More specifically, since the Court's entry of the Civil Case Discovery Plan and Scheduling Order on March 16, 2022, the parties have been diligently proceeding with discovery. To this end, both Plaintiffs and Defendants have served requests for documents and interrogatories, as well as objections and responses to same. Additionally, in accordance with the parties' So-Ordered agreement on the production of sample class-wide documents (Dkt. 16), Defendants have produced over 700 pages of documents, including time and payroll records, tip sheets, and paychecks. Defendants continue to investigate whether additional responsive sample class-wide documents exist and will use good faith efforts to produce any such documents in their custody, possession or control by May 31, 2022. The parties have also scheduled the depositions of Defendants Enzo Pezone and Patrizio Siddu (who will serve as PEC Group Ltd.'s Rule 30(b)(6) witness), as well as the deposition of Plaintiff Carlos Lopez, and are working together to schedule the depositions of Plaintiffs Jorge Molina and William Ramones.

This is the parties' first request for the requested extension. We thank the Court in advance for its time and consideration.

Respectfully submitted,

/s/ Jason S. Giaimo
Jason S. Giaimo

cc: Plaintiffs' counsel (via ECF)